

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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MARK SOKOLOW, *et al.*,

Plaintiffs,

- against -

THE PALESTINE LIBERATION ORGANIZATION,
et al.,

Defendants.

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**DEFENDANTS' OBJECTIONS AND RESPONSES TO
PLAINTIFFS' FIRST REQUEST FOR ADMISSIONS TO DEFENDANTS
(TO THE SOKOLOW PLAINTIFFS)**

Defendants The Palestinian Authority ("PA") and the Palestine Liberation Organization ("PLO") (collectively "Defendants"), by their counsel, and pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, hereby respectfully submit their Objections and, where applicable, Responses to "Plaintiffs' First Request for Admissions to Defendants," dated November 21, 2012 ("Request" or "Requests"), and state as follows:

GENERAL OBJECTIONS

1. Defendants object to the Requests to the extent that the definitions or instructions set forth therein seek to impose requirements beyond those contained in the Federal Rules of Civil Procedure and the Local Rules of this Court.

2. Defendants object to the Requests to the extent that they seek admissions concerning matters that are "in dispute." *See* Fed. R. Civ. P. 36, cmts.

3. Defendants object to the Requests to the extent that they refer to documents that were not created by Defendants or cannot be authenticated by Defendants through a reasonable

OBJECTIONS:

Defendants incorporate herein by reference the foregoing General Objections. In addition, Defendants object to Request No. 4 on the grounds that, as potentially construed, the use of the words and phrase “affiliated with” is vague and ambiguous.

RESPONSE:

Defendants incorporate herein by reference the foregoing General and Specific Objections to Request No. 4. Subject to, and without waiving those Objections, Defendants respond based on their understanding and interpretation of the terms contained in the Request as follows:

Defendants deny this Request.

REQUEST:

5. The PLO Executive Committee is headed by Mahmoud Abbas.

OBJECTIONS:

Defendants incorporate herein by reference the foregoing General Objections. In addition, Defendants object to Request No. 5 on the grounds that, as potentially construed, the use of the words and phrase “headed by” is vague and ambiguous.

RESPONSE:

Defendants incorporate herein by reference the foregoing General and Specific Objections to Request No. 5. Subject to, and without waiving those Objections, Defendants respond based on their understanding and interpretation of the terms contained in the Request as follows:

Defendants admit this Request.

REQUEST:

6. The newspaper *Al-Hayat Al-Jadida* is the PA's official daily newspaper.

OBJECTIONS:

Defendants incorporate herein by reference the foregoing General Objections. In addition, Defendants object to Request No. 6 on the grounds that, as potentially construed, the use of the words and phrase "official daily newspaper" is vague and ambiguous.

RESPONSE:

Defendants incorporate herein by reference the foregoing General and Specific Objections to Request No. 6. Subject to, and without waiving those Objections, Defendants respond based on their understanding and interpretation of the terms contained in the Request as follows:

Defendants deny this Request.

REQUEST:

7. Mohammed Hasheika ("Hasheika"), was the suicide bomber in the Bauer bombing on March 21, 2002.

OBJECTIONS:

Defendants incorporate herein by reference the foregoing General Objections. In addition, Defendants object to Request No. 7 on the grounds that, as potentially construed, the use of the words and phrases "Mohammed Hasheika," "suicide bomber," and "Bauer bombing" is vague and ambiguous.

RESPONSE:

Defendants incorporate herein by reference the foregoing General and Specific Objections to Request No. 7. Subject to, and without waiving those Objections, Defendants